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19 Attorneys for Plaintiffs
20 MMR GROUP, INC., MMR POWER SOLUTIONS, LLC and
21 SOUTHWESTERN POWER GROUP II, LLC

22 **UNITED STATES DISTRICT COURT**
23 **NORTHERN DISTRICT OF CALIFORNIA**
24 **SAN FRANCISCO DIVISION**

25 MMR GROUP, INC.;
26 MMR POWER SOLUTIONS, LLC; and
27 SOUTHWESTERN POWER GROUP II, LLC,

28 Plaintiffs,

vs.

STA DEVELOPMENT, LLC f/k/a SOLAR
MILLENNIUM, LLC, a California limited
liability company; SOLAR TRUST OF
AMERICA, LLC, a Delaware limited liability
company; SOLAR MILLENNIUM AG, a foreign
corporation; SOLAR MILLENNIUM, INC., a
Delaware corporation; CA I-10 SOLAR, LLC, a
California limited liability company; PALO
VERDE SOLAR I, LLC, a Delaware limited
liability company; PALO VERDE SOLAR II,
LLC, a Delaware limited liability company;
BLYTHE SOLAR POWER PROJECT UNIT 1,
LLC, a Delaware limited liability company;

Case No. 3:11-cv-01521-EMC

**REQUEST FOR JUDICIAL NOTICE
IN SUPPORT OF MOTION FOR
LEAVE TO AMEND COMPLAINT**

The Honorable Edward M. Chen

DATE: October 7, 2011
TIME: 1:30 p.m.
COURTROOM NO. 5

1 BLYTHE SOLAR POWER PROJECT UNIT 2,
2 LLC, a Delaware limited liability company;
3 BLYTHE SOLAR POWER PROJECT UNIT 3,
4 LLC, a Delaware limited liability company; and
5 BLYTHE SOLAR POWER PROJECT UNIT 4,
6 LLC, a Delaware limited liability company.

Defendants.

7 Pursuant to Rule 201 of the Federal Rules of Evidence, Plaintiffs MMR Group, Inc.,
8 MMR Power Solutions, LLC and Southwestern Power Group II, LLC (collectively "MMR")
9 respectfully request that the Court take judicial notice of the following facts in support of MMR's
10 Motion for Leave to Amend Complaint:

11 1. On January 19, 2010, MMR filed its Petition against Solar Millennium, LLC in the
12 19th Judicial District Court for the State of Louisiana, Parish of East Baton Rouge.

13 2. This lawsuit was ordered removed to federal court on February 5, 2010 and was
14 transferred to the Northern District of California on March 22, 2011.

15 3. STA filed a motion to dismiss, which is scheduled to be heard on September 8,
16 2011 along with a case management conference.

17 4. STA has not filed an answer and no trial date is set.

18 Dated: August 29, 2011

**WATT, TIEDER, HOFFAR
& FITZGERALD, L.L.P.**

19 By: /s/ Nicholas A. Merrell

20 Bennett J. Lee

21 Nicholas A. Merrell

22 Attorneys for Plaintiffs MMR GROUP, INC.,

23 MMR POWER SOLUTIONS, LLC and

24 SOUTHWESTERN POWER GROUP II, LLC